

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PATRICIA WASHINGTON,	:	
Plaintiff,	:	
	:	DOCKET NO. 04-cv-30129-KPN
	:	
v.	:	
	:	
SPRINGFIELD COLLEGE,	:	
Defendant.	:	

**JOINT MOTION TO MODIFY PRETRIAL
SCHEDULING ORDER**

The parties in the above-entitled matter respectfully request that the Pretrial Scheduling Order be amended as follows:

- (1) Non-expert depositions to be completed by September 15, 2005;
- (2) The case management conference be re-set to another date after September 15, 2005; and
- (3) The trial in this matter be re-set to another date to allow time to file and respond to dispositive motions. In this regard the plaintiff's counsel wishes to advise the Court that she will be out of the country on a pre-paid vacation from November 28, 2005 until December 12, 2005.

As grounds for this motion, the parties state that the parties have been involved in resolving outstanding discovery disputes in an attempt to avoid intervention of the Court. The parties have scheduled depositions but due to the press of other business and vacation schedules of the deponents and counsel are unable to complete depositions at this time. In addition, the parties have begun to discuss the possibility of an early settlement prior to expending significant resources in this matter. Accordingly, the parties would like an

additional six (6) weeks to explore the possibility of settlement and complete non-expert depositions.

Respectfully submitted,

THE DEFENDANT
By its Attorneys

THE PLAINTIFF
By her Attorney,

/s/ James E. Wallace Jr.

James E. Wallace, Jr. BBO# 513440

Kathryn Abare-O'Connell BBO# 647594

Bowditch & Dewey, LLP

311 Main Street, P.O. Box 15156

Worcester, MA 01615

(508) 791-3511

/s/ Suzanne Garrow

Suzanne Garrow BBO# 636548

Heisler, Feldman & McCormick, P.C.

1145 Main Street, Suite 508

Springfield, MA 01103

(413) 788-7988